

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 1 of 2

Applicant Name: George J. McCouch

Proceeding Name: 98-143 Author Name: George J. McCouch

Lawfirm Name:

Contact Name:

Contact Email: geomac@hop-uky.campus.mci.

Address Line 1: 3422 Greenwood Dr.

Address Line 2:

City: Hopkinsville

State: KY ☒

Zip Code: 42240 Postal Code:

Submission Type: CO ☒ Submission Status: ACCEPTED ☒ Viewing Status: UNRESTRICTED ☒

Subject:

DA Number:

Exparte Late Filed: File Number:

Calendar Date Filed: 08/14/1998 4:07:12 PM

Date Disseminated:

Filed From: EMAIL

Official Date Filed: 08/14/1998

Date Released/Denied:

Initials:

Confirmation #

Date Filed:

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 2 of 2

Applicant Name: George J. McCouch

Proceeding Name: 98-143 Author Name: George J. McCouch

Lawfirm Name:

Contact Name:

Contact Email: geomac@hop-uky.campus.mci.

Address Line 1: 3422 Greenwood Dr.

Address Line 2:

City: Hopkinsville

State: KY ☒

Zip Code: 42240 Postal Code:

Submission Type: CO ☒ Submission Status: ACCEPTED ☒ Viewing Status: UNRESTRICTED ☒

Subject:

DA Number:

Exparte Late Filed: File Number:

Calendar Date Filed: 08/14/1998 4:02:08 PM

Date Disseminated:

Filed From: EMAIL

Official Date Filed: 08/14/1998

Date Released/Denied:

Initials:

Confirmation #

Date Filed:

INTERNET FILING

98-143

8/14/98

DOCKET FILE COPY ORIGINAL

RECEIVED

AUG 14 1998

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

1 of 1
1/1/98

There has been considerable discussion about the FCC proposal to restructure and streamline the ARS, particularly in the areas of licensing. It is proposed that the number of licenses be reduced from 6 to 4 by eliminating both the Novice and Technician license apparently through a slow attrition process. The American Radio Relay League has forwarded a proposal to the Commission which I generally support, but there are major differences in that the FCC is initially proposing and what the ARRL has proposed. I believe that the two proposals can be reconciled and still accomplish the aims stated by the commission in docket 98-143.

Here are my comments and the reasons for them.

1. I propose that every licensed amateur, regardless of license class has operating privileges on the 2 meter and the 70 cm bands.

In the Commission's own words in 98-143, "The Amateur Radio Service rules are designed to provide emergency communications, advance radio technology, improve operator skills, enhance international goodwill, and expand the number of trained operators, technicians and electronic experts.

The Novice class does not have these privileges, yet the vast majority of all public service and emergency communications work is accomplished on 2 meters and 70 cm FM. adding these privileges to the Novice class license, in the absence of further grandfathering upgrades, will expand the pool of operators who will be available, particularly in local and regional emergencies. If the Commission does not add anything else to its stated proposal, this at least should take place.

2. If there is to be a major restructure of licensing and operating privileges, then, as noted, the ARRL proposal is a good place to look to start the process. I would recommend the following changes be considered.

Class A (present Extra Class) have all amateur privileges but with a CW test of 10 WPM for NEW applicants and the present written exam.

Class B Merge the present General and Advanced Licensees, NEW applicants must pass a 10 WPM CW test and the present written element 4A. Same privileges at the present Advanced Class.

Class C Merge all Novice and Technician+ licensees, NEW applicants must pass a 5 WPM CW test and a written test which includes some elements of the present Novice, Technician and General written exam. Emphasis should be on safety, operating procedure, rules and regulations, public and emergency services, and the basic electronic and antenna theory. Operating privileges should be conferred for specific frequency ranges of every amateur band and mode.

Class D This would stay the same as it is now with no CW test, and NEW applicants passing the same written test as Class C.

With this proposal, no amateur loses any privileges he or she has earned, and it establishes a very real entry way into HF operations where the traditional entry way is presently very limited in terms of operating privileges.

3. The Commission also asked for comments concerning CW testing.

Although there have been vocal calls for the Commission to eliminate CW testing completely, it is still a useful mode of communications and our obligations under the ITU treaty require that proficiency be tested in order to gain access to HF operating privileges. 5 WPM proficiency has been the traditional accepted proficiency for entry level licenses with HF operating privileges. I see no compelling reason to change this.

There was a time in the history of Amateur Radio, up to 1936, when 10 WPM was all the CW proficiency required to obtain any class of license. This was in an era where CW communications were the vast majority of Amateur communications. It is my opinion that CW is too fully ingrained into the traditions of the ARS to discontinue testing as part of the HF licensing requirements.

4. I fully agree with the Commission's proposals concerning the modification of the VE program, and like most other amateurs I would like to see the Commission again take an active role in rule enforcement in the ARS.

I appreciate this opportunity to comment on Docket 98-143 and look forward to the Commission's actions regarding this matter.

Sincerely,

George J McCouch
W3GEO

-----_1308993461==_-----